Before the Federal Communications Commission Washington, DC 20554

| In the Matter of |) |
|--|------------------------|
| Implementation of Section 621(a)(1) of |) |
| The Cable Communications Policy Act |) MB Docket No. 05-311 |
| Of 1984 as Amended by the Cable |) |
| Television Consumer Protection and |) |
| Competition Act of 1992 |) |

COMMENTS OF THE WORLD INSTITUTE ON DISABILITY

I. DISCUSSION

The World Institute on Disability (WID) is a nonprofit research, training and public policy center promoting the civil rights and the full societal inclusion of people with disabilities. WID is also a member of the Consumers for Cable Choice (C4CC)¹ alliance of organizations promoting increased competition in the cable television market to enhance choices, reduce prices and spur innovation. Specifically, WID supports C4CC's goals because a competitive marketplace makes service providers more responsive to consumers needs which is especially important to people with disabilities. In addition, innovation in the communications marketplace will continue to enhance the productivity and independence of people with disability with applications from video relay services to home healthcare services.

Broadband technologies provide enormous benefits to all consumers, particularly people with disabilities. The FCC repeatedly noted the importance of broadband in its September 2004 report, "Availability of Advanced Telecommunications Capability in the United States." Advanced communications technologies make possible numerous applications including remote sign language interpreting, which greatly enhances the quality of life for people who are deaf or hard of hearing. Broadband also supports peer-to-peer signing, a revolutionary development that allows people to engage in live 2-way communications at a distance.

¹ Consumers for Cable Choice, Inc. is a not-for-profit corporation formed under Section 501(c)(4) of the Internal Revenue Code.

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Broadband also supports telemedicine applications, which are invaluable for people with disabilities, particularly those who are homebound. In addition, with rapid increase of broadband deployment, home healthcare will not only save costs but will allow people with disabilities access to specialists without having to arrange for potentially burdensome travel.² Advanced broadband to the home can also provide increased employment and educational opportunities, helping people with disabilities remain independent, productive and valued members of society.³

Current barriers to broadband technologies for people with disabilities include availability and affordability. As we have seen in other industries, increased competition in a marketplace typically leads to lower costs and greater access. We believe that greater competition in the cable market will not only bring down costs and increase access but will bring better service and innovative applications – benefits to all consumers, particularly those with disabilities.

II. CONCLUSION

As the FCC noted in its Notice of Proposed Rulemaking, broadband deployment and franchise relief are intrinsically linked. Being that access to advanced telecommunications can significantly enhance the lives of people with disabilities, we urge the FCC to use its legal and statutory authority to reform the current franchise regulations and promote greater competition in the cable marketplace.

Respectfully submitted,

Kathy Martinez
Executive Director

February 13, 2006

 ² "Great Expectations: Potential Economic Benefits to the Nation from Accelerated Broadband Deployment to Older Americans and People with Disabilities," Robert Litan. New Millennium Research Council, December 2005.
 ³ Ibid.